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April 11, 2000

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Ms. Magalie Romas Salas Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

CC Docket No. 99-200

NSD File No. L-99-101 (PA); NSD File No. L-99-89 (UT); File No. NSD-L-99-102 (WA)¹

Dear Ms. Salas:

On April 10, 2000, Hank Hultquist, Jim Joerger, and I of MCI WorldCom, Inc. and Dan Meldazis of Focal Communications Corporation (Focal) met with Yog Varma, Chuck Keller, Diane Harmon, Les Selzer, Cheryl Callahan, and Aaron Goldberger of the Common Carrier Bureau to discuss a recently completed feasibility trial concerning unassigned number porting (UNP) between MCI WorldCom and Focal.

We discussed how the porting of unassigned numbers can add to the better utilization of numbering resources and further the Commission's goal of improved number assignment efficiencies. We urged the Commission to grant authority to at least one state to conduct trials on the porting of unassigned numbers. We distributed the attached document at the meeting.

In accordance with section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, an original and one copy of this memorandum are being filed with your office.

Karen M. Johnson

Associate Counsel, Regulatory Affairs

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¹ Petitions of the Pennsylvania Public Utility Commission, the Utah Public Service Commission, and the Washington Utilities and Transportation Commission for delegated authority to pursue number conservation measures in their states.

cc: Yog Varma
Chuck Keller
Diane Harmon
Les Selzer
Cheryl Callahan
Aaron Goldberger
Jeannie Grimes

Meeting with FCC Common Carrier Bureau April 10, 2000

Unassigned Number Porting Trial Report

Focal Communications and MCI WorldCom

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Two UNP Scenarios Tested

Scenario One: Specific customer requests to port unassigned numbers from one carrier to another

Scenario Two: Establishing carrier footprints with small quantities of numbers

Scenarios tested in three major cities with forty numbers

What UNP Should and Should Not Do

- Moves spare numbers between carriers
- Benefits competition and conservation
- Use for specific customer requests
- Use to establish rate area footprint
- Limited scope 25 numbers per request
- Not intended for inventory building

Key Goals of Trial

- Demonstrate current LSR process can handle UNP
- Determine third party administrator is not needed
- Ensure LNP supports porting spare numbers
- Show that systems can reserve and donate numbers
- Determine if number needs to be activated
- Test specific UNP customer request scenario
- Test UNP carrier footprint scenario

General Findings

- Determined LNP systems can support UNP ports
- If carrier can mark working numbers as ported out, it can mark numbers UNP-ported out
- Donor carrier needs to be unambiguous
- Carrier can support UNP if OSS supports pooled port-ins
- Pooling should enable widespread UNP

LNP Inter Carrier Processes Support Customer Specific UNP Scenario

- Standard LSRs with annotated remarks is sufficient
- LSR can be FAX or e-mail transmission
- Firm Order Confirmation process unchanged
- No change to LIDB, CARE, DA/DL
- Receiving carrier processes 911 records as "new"

LNP Inter Carrier Processes Support Footprint UNP Scenario

- Standard LSR with annotated remarks is sufficient
- LSR can be FAX or e-mail transmission
- No change to Firm Order Confirmation process
- No change to LIDB, CARE, DA/DL updates
- Receiving carrier processes 911 records as "new"
- No snap-back required as number stays in inventory

Conclusions and Next Step

- UNP is feasible
- Interactions between provisioning groups successful
- Should set 25 TN limit per request
- Donor needs to be unambiguous
- No need to activate numbers before porting
- Do not need third party administrator
- All test calls completed without difficulty
- Next Step: Ad-hoc UNP meeting
 - Goal is to share information and seek ILEC trial